REMARKS

Claims 1 - 10 remain active in this application. Claim 1 has been amended to repeat language presented earlier in the claim to improve clarity and emphasize novel features of the invention. Support for the amendments of the claims is found throughout the application, particularly in Figure 1 and the description thereof on pages 6 - 7 and summarized on page 4 of the specification as originally filed. No new matter has been introduced into the application.

The withdrawal of previous grounds of rejection and the continued allowance of claim 2 are noted with appreciation. The Examiner's indication that an interview will be granted on request is gratefully acknowledged.

Claims 1 and 3 - 10 have been rejected under 35 U.S.C. §102 as being anticipated by de Gyarfas et al. This sole ground of rejection in this application is respectfully traversed, particularly as being moot in view of the above amendment to claim 1.

As previously pointed out, the invention is directed to an arrangement for programming an interface for a system including a computing device which may be expensive to operate or require operator attention (such as in an avionics application or operation of other complex machinery) to a such a degree that development or modification of the interface during system operation is impractical or possibly dangerous. Thus the invention provides for an input to an interface simulator of the information and programming which provide the interface for the system, modification of the simulation of the interface, correspondingly modifying the information previously input to the simulator and transfer of that modified information back to the system to reprogram the original interface of the system which will then

include the modifications made using the simulator.

The de Gyarfas et al. patent, while more relevant to the invention than prior art previously applied, nevertheless is very different from the invention as claimed, both as presently rejected and as now amended, in important and significant respects. Specifically, de Gyarfas et al. is directed to a trainer apparatus which simulates another apparatus or system operating environment (rather than simply simulating the interface) by superimposing or overlaying images which simulate displays and manipulable controls on a stored image of the operating environment. As the Examiner points out, the term "glass trainer" is used to convey the distinction that the operating environment is displayed rather than using a mock-up for the operating environment in the training simulator to avoid the cost of altering or reconstructing mock-ups when alterations are made in the actual system operating environment. It is pointed out in de Gyarfas et al (column 3, lines 32+) that the operating environment image is preferably derived from a photograph of the actual system operating environment but that graphic illustration techniques may be used, as well. However, while the display of the operating environment may be thus modified from training session to training session and the Examiner's observation that the interface is programmed on one processor (graphics authoring workstation 18, also identified with reference numeral 14) and the simulation carried out on another processor (glass student training workstation 16) is well-taken, nothing is seen in de Gyarfas et al. which contemplates modification *on the graphics authoring workstation 12* of the operating environment simulation *developed by the graphics authoring workstation 12* during the course of a training or any other simulation, much less by means of the simulator. In this regard, the discussion in columns 7 and 8 of de Gyarfas et al. to which the

Examiner repeatedly refers is a detailed discussion of the manipulations conducted from the screen of Figure 7 which is essentially a state diagram for selecting screens from a hierarchy for authoring or modification/update of coursework which is performed from the database authoring workstation 14 (see column 7, line 6).

Otherwise, the only modifications performed are simulation database updates and courseware graphics authoring described in columns 9 - 11 which are also performed from the database authoring workstation 14 (see column 9, line 13) or the graphics authoring workstation 12 (see column 11, line 7). While these updates appear to allow modifications of graphics, there is no indication that they can be performed from the training simulation workstation or during the course of simulation, much less from the training simulation workstation.

In summary, the only alteration of the simulation display performed from the training simulation workstation is the overlay information representing the states of manipulable controls (responsive to a touch screen) which do not (and should not) modify the operating environment or the simulation/image thereof of the interface and thus does not answer the recitations of the claims. Moreover, contrary to the assertions by the Examiner, there appears to be no *generation of an operator interface simulation program* from the data authored on another workstation (e.g. other than the simulation program which is authored or modified by the authoring workstations) and certainly no teaching or suggestion of reprogramming of the interface (e.g. as distinct from the *simulated* interface or the computer by which the simulated interface is produced) by modifying definitional tables in the course of simulation or through use of the training simulator workstation of de Gyarfas et al. and

transferring them to the computer from which the interface was originally derived, particularly since de Gyarfas et al. is arranged primarily to provide training with respect to a *given* although arbitrarily changeable operational environment rather than for development of that operational environment, *per se*, in accordance with the invention and its meritorious effects.

Therefore, it is clearly seen that de Gyarfas et al. does not, in fact teach (or suggest) any generation of a simulated interface *from information for generating an actual interface* much less generation of a simulation program therefrom, modification of any aspect of the simulated interface *during the course of the simulation or through use of a computer on which the interface simulation is produced*, modification of the interface simulation data corresponding to changes made in the interface *during the course of the simulation or through use of a computer on which the interface simulation is produced*, or reprogramming of the *actual* interface or the computer which produces it from any such modified data. Therefore, it is clear that de Gyarfas et al. does not, in fact, support a *prima facie* demonstration of anticipation of any claim in the application.

In this latter regard, in particular, it is abundantly evident that de Gyarfas et al. does not modify data produced at either of the authoring workstations from the training simulation workstations and the only way the last paragraph of claim 1 could be asserted to be even colorably answered by de Gyarfas et al., particularly in the passage of column 12, relied upon by the Examiner, is by reading the simulated manipulable control actuation as interface data and then confusing the interface simulation/simulator programming with the programming of the actual system producing the actual interface. In an effort to avoid

such a construction, claim 1 has been amended to make clear that it is the computer producing the original interface which is reprogrammed in accordance with the invention. Therefore, it is respectfully submitted that the asserted ground of rejection is even more clearly untenable in regard to the claims as now amended as well as being clearly in error in regard to the claims as presently rejected. Accordingly, reconsideration and withdrawal of the ground of rejection based on de Gyarfas et al. are respectfully requested.

Since all rejections, objections and requirements contained in the outstanding official action have been fully answered and shown to be in error and/or inapplicable to the present claims, it is respectfully submitted that reconsideration is now in order under the provisions of 37 C.F.R. §1.111(b) and such reconsideration is respectfully requested. Upon reconsideration, it is also respectfully submitted that this application is in condition for allowance and such action is therefore respectfully requested.

If an extension of time is required for this response to be considered as being timely filed, a conditional petition is hereby made for such extension of time. Please charge any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041.

Respectfully submitted,

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